



Ann D. Berkowitz  
Associate Director  
Federal Regulatory Advocacy

1300 I Street, NW  
Suite 400 West  
Washington, DC 20005  
(202) 515-2539  
(202) 336-7922 (fax)  
aberkowitz@verizon.com

March 18, 2005

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Telephone Number Portability, CC Docket No. 95-116**

Dear Ms. Dortch:

Yesterday, Gary Sacra, Doug Sullivan, Josh Swift and the undersigned of Verizon met with Pam Slipakoff and Cheryl Callahan of the Wireline Competition Bureau and Jeff Steinberg and Jennifer Salhus of the Wireless Telecommunications Bureau to discuss of the above proceeding. Verizon reaffirmed its position of record and used the attached handout for that discussion. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann D. Berkowitz".

cc: Pam Slipakoff  
Cheryl Callahan  
Jennifer Salhus  
Jeff Steinberg

# *Verizon Intermodal Porting Interval Presentation*

March 17, 2005

# *Key Points*

---



- Maintain current 96-hour intermodal porting interval.
- Consumer benefit and demand not demonstrated for shortened interval.
- High cost to shorten interval (over \$10 million)
- Industry actively addressing order and confirmation fallout issues.
- If interval shortened, carriers must be allowed to recover their costs.

- NANC stated that “further analysis by Service Providers and Regulators is warranted before a decision is made to implement” a 53-hour interval (NANC Report at 4, 32).
- Any shortened interval would “apply only to simple intermodal port requests that are error free” (NANC Report at 32).
- NANC acknowledged that current wireline porting interval was established to support providers’ diverse complex systems and processes.
- NANC Report did not answer fundamental questions, such as:
  - ◆ Consumer demand and benefit
  - ◆ Network and support systems impacts
  - ◆ Costs and Cost Recovery

# *Consumer Demand vs. Societal Cost*



## **Consumer Demand:**

- The first 11 months of wireless porting, less than 4% of all ports were intermodal.
  - ◆ Out of approximately 14 million competitive ports, only 500K were intermodal ports in that period.
- Consumer demand has been decreasing.
  - ◆ 40% reduction in intermodal ports month-over-month since November 2004.

## **Societal Cost:**

- Preliminary estimates suggest Verizon alone would need to spend in excess of ten of million dollars to ensure end-to-end mechanized flow through on intermodal ports.

# *Ongoing Efforts to Address Interval Issues*



- LNPA-WG and OBF currently addressing additional issues related to order/confirmation fallout
  - ◆ Both industry groups represented by wireline, wireless, clearinghouse vendors
  - ◆ Working to identify and document carriers' diverse system requirements, edits, validations
  - ◆ Addressing issue of additional orders required to clear multiple errors
- ATIS Committees to determine if Name, Address, Date fields on ordering forms can be standardized
- FCC should allow industry to continue to address these pre-port issues

Industry attention to following porting issues:

- Due Date and Time changes on Confirmations (LNPA PIM 28 referred to OBF)
- Due Date and Time changes on Jeopardy Notices (LNPA PIM 31)
- Porting of Type 1 Cellular Numbers (LNPA PIM 34)
- Inadvertent Porting of Type 1 Paging Numbers (LNPA PIM 49)

- Any shortening of porting interval will result in carrier network, support system, and labor costs.
- NANC recognized that any shortening of the porting interval meets the “but for LNP” rule for cost recovery.
- Carriers must be allowed to recover costs if a shortened porting interval is ordered.